

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
True LD, LLC	)	
	)	
and	)	WC Docket No. 08-92
	)	
STi Prepaid, LLC	)	
	)	
Application for Authority to Transfer Control of Assets	)	
pursuant to Section 214 of the Communications Act of	)	
1934, as amended,	)	
	)	

**MOTION OF APCC SERVICES, INC.  
FOR LEAVE TO FILE SUPPLEMENTAL COMMENTS**

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Attorneys for APCC Services, Inc.

Dated: July 14, 2008

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
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FOR LEAVE TO FILE SUPPLEMENTAL COMMENTS**

APCC Services, Inc. (“APCC Services”), hereby moves for leave to submit supplemental comments regarding the application of True LD, LLC (“True”) and STi Prepaid (“STi”) for Commission authorization for the transfer to STi of True’s assets related to the provision of prepaid calling card services. *See* Public Notice, DA 08-1466 (rel. June 23, 2008).

In its original comments, APCC Services urged the Commission to deny the application, or at a minimum to remove the application from the processing line pending a full investigation of the involvement with True of True’s chairman, Jeffrey Larsen, and of two companies owned or controlled by Mr. Larsen -- West Star Telecommunications, Inc. (“West Star”) and Global Access, Inc. (“Global Access”) – that are subject to pending Notices of Apparent Liability for Forfeiture (“NALs”) for repeatedly failing to respond to the Commission’s process in violation of the Commission’s rules. True filed the instant transfer application without disclosing the pending proceedings or the relationships among Mr. Larsen, True, West Star, and Global Access.

In its July 7, 2008, comments, APCC Services noted that it was continuing to gather information about the ownership, structure, and accounting practices of Mr. Larsen's companies. On July 11, 2008, four days after filing its comments, APCC Services learned additional information relevant to these issues. Therefore, APCC Services is filing to supplement the record in this proceeding.<sup>1</sup>

Specifically, APCC Services learned that all the payments due from Global Access to another company, Southwest Communications, Inc., pursuant to a telecommunications services agreement between those two companies were in fact paid by True, not Global Access, further supporting the allegation in APCC Services' comments that True is an "alter ego" of Global Access, and that consequently, the pending NAL against Global Access is equally attributable to True. *See* Comments of APCC Services (filed July 7, 2008); Supplemental Comments of APCC Services (filed July 14, 2008).

Since it learned of the instant transfer application, APCC Services diligently gathered information available to it regarding the relationships among Jeffrey Larsen, True, Global Access, and West Star. The information described above was not immediately available to APCC Services because it was held by another party. The information was disclosed to APCC Services on Friday, July 11, 2008, and is being submitted to the Commission within one business day after APCC Services obtained it.

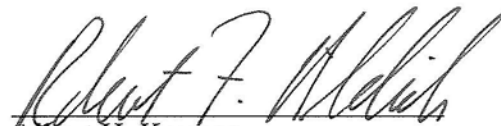
APCC Services' supplemental comments are being filed only five business days after the due date for comments. Therefore, consideration of the supplemental comments will entail minimal delay in the Commission's consideration of the instant application. Therefore, there is good cause for the Commission to accept for filing APCC Services' supplemental comments.

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<sup>1</sup> APCC Services sought the parties' consent to this motion but consent was denied.

For the foregoing reasons, the Commission should GRANT APCC Services' motion for leave to file supplemental comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert F. Aldrich", written over a horizontal line.

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Dated: July 14, 2008

**CERTIFICATE OF SERVICE**

I hereby certify that on July 14, 2008, a copy of the foregoing Motion of APCC Services, Inc. for Leave to File Supplemental Comments was delivered via overnight delivery or electronic mail(\*) as indicated to the following parties:

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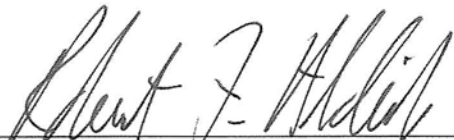
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